

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

GREATGIGZ SOLUTIONS, LLC,

Plaintiff

v.

**MAPLEBEAR INC. D/B/A
INSTACART**

Defendant

Case No. 6:20-cv-737-ADA

JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND THE DEADLINES FOR PLAINTIFF’S
RESPONSE AND DEFENDANT’S REPLY
TO DEFENDANT’S MOTION TO DISMISS**

GreatGigz Solutions, LLC (“Plaintiff”) moves the Court for an extension of the deadline for Plaintiff to file a response and Defendant to file a reply to Defendant’s Motion to Dismiss (“Motion”). Defendant filed its Motion on October 27, 2020 [Dkt. No. 11]. Plaintiff’s response to the Motion is currently due on November 10, 2020. To allow the Parties address venue discovery related to the allegations set forth in Defendant’s motion to transfer to the Northern District of California, the Parties have stipulated and agreed to extend the deadline for Plaintiff to respond to the Motion to be up to and including December 4, 2020, and to extend the deadline for Defendant to reply to be up to and including December 18, 2020. Plaintiff agrees that it will not rely on this extension in any way as a reason to deny the Motion. This motion and agreement between the Parties should not be construed as a waiver of any other rights or defenses.

Accordingly, as stipulated and agreed by the Parties, Plaintiff respectfully requests the deadline for Plaintiff's response to Defendant's Motion to be up to and including December 4, 2020, and that the deadline for Defendant's reply be up to and including December 18, 2020.

Date: November 10, 2020

Respectfully submitted,

/s/ Thomas G. Fasone III

Thomas G. Fasone III
Texas Bar No. 00785382
tfasone@ghiplaw.com
M. Scott Fuller
Texas Bar No. 24036607
sfuller@ghiplaw.com
GARTEISER HONEA, PLLC
119 W. Ferguson Street
Tyler, Texas 75702
Telephone: (903) 705-7420
Facsimile: (888) 908-4400

Raymond W. Mort, III
Texas State Bar No. 00791308
raymort@austinlaw.com
THE MORT LAW FIRM, PLLC
100 Congress Ave, Suite 2000
Austin, Texas 78701
Tel/Fax: (512) 865-7950

**ATTORNEYS FOR
GREATGIGZ SOLUTIONS, LLC**